



Writer's Direct Dial: 484-270-1456  
E-Mail: [snirmul@ktmc.com](mailto:snirmul@ktmc.com)

November 24, 2020

**VIA ECF**

The Honorable John P. Cronan  
United States District Judge  
United States District Court  
for the Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Room 1320  
New York, NY 10007-1312

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 11/24/2020

Re: *In re Luckin Coffee Inc. Securities Litigation*,  
No. 1:20-cv-01293-JPC-JLC (S.D.N.Y)

Dear Judge Cronan:

On behalf of Lead Plaintiffs Sjunde AP-Fonden and Louisiana Sheriffs' Pension & Relief Fund ("Lead Plaintiffs") in the above-referenced securities class action, we write in accordance with Your Honor's Individual Rules and Practices in Civil Cases ¶ 3.B ("Requests for Adjournments or Extensions of Time") to respectfully request the entry of a briefing schedule regarding Defendant Thomas P. Meier ("Defendant Meier")'s response to the Consolidated Class Action Complaint ("Consolidated Complaint").

Lead Plaintiffs filed the Consolidated Complaint on September 24, 2020, which named Defendant Meier as a Defendant. ECF No. 150. On November 6, 2020, Lead Plaintiffs requested that Defendant Meier, who is located in Switzerland, waive service of the summons in this action. On November 13, 2020, Defendant Meier, through his counsel, executed a waiver of service of the summons. ECF No. 203. Pursuant to Federal Rule of Civil Procedure 4(d), Defendant Meier must file an answer or a motion to dismiss within ninety (90) days of the date when the request for waiver of service was sent. Judge Liman previously ordered that to the extent any additional defendants are served the Consolidated Complaint, Lead Plaintiffs shall make reasonable efforts to confer with such defendants within seven (7) days of service to discuss a proposed schedule for responding to the Consolidated Complaint. ECF No. 129. On November 20, 2020, Lead Plaintiffs and counsel for Defendant Meier met and conferred regarding a schedule for Defendant Meier's response to the Consolidated Complaint.

Subject to the Court's approval, Lead Plaintiffs and counsel for Defendant Meier jointly propose the following schedule:

Hon. John P. Cronan  
November 24, 2020  
Page 2



1. Pursuant to Federal Rule of Civil Procedure 4(d), Defendant Meier shall file an answer or otherwise respond to the Consolidated Complaint on or before February 4, 2021.
2. If Defendant Meier files a motion to dismiss the Consolidated Complaint, Lead Plaintiffs shall file a response within sixty (60) days of the filing date of the motion to dismiss.
3. Defendant Meier shall file a reply to the response to the motion to dismiss within thirty days of the filing date of Lead Plaintiffs' response.

Under Local Civil Rule 6.1(b), Lead Plaintiffs' response to a motion to dismiss by Defendant Meier would be due within fourteen (14) days after service of the motion. Defendant Meier's reply would be due within seven (7) days after service of Lead Plaintiffs' response. There have been no prior requests for an extension of the above deadlines by any party. The proposed schedule for Defendant Meier's response to the Consolidated Complaint will not affect any other scheduled dates.

In agreeing to this schedule, Defendant Meier is not waiving any objection to personal jurisdiction or venue, and not waiving any other defense or objection.

We thank the Court for its attention to this matter.

Respectfully submitted,

Sharan Nirmul

cc: All Counsel of Record (via ECF)

It is hereby ORDERED that the request of Lead Plaintiffs and Defendant Thomas P. Meier is GRANTED. Defendant Meier shall file an answer or otherwise respond to the Consolidated Complaint by February 4, 2021. If Defendant Meier files a motion to dismiss, Lead Plaintiffs shall file a response within 60 days of the filing of that motion, and Defendant Meier shall file his reply, if any, within 30 days of Lead Plaintiffs' response.

SO ORDERED.

Date: November 24, 2020  
New York, New York

JOHN P. CRONAN  
United States District Judge